

HANG & ASSOCIATES, PLLC

ATTORNEYS AT LAW

136-20 38th Avenue, Suite 10G
Flushing, New York 11354

July 23, 2020

Jiajing Fan, Esq.
Tel : (718) 353-8588
Fax: (718) 353-6288
Email: jfan@hanglaw.com

Via ECF

Honorable Judge Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application granted in part. Troy Law shall not directly solicit or contact plaintiffs represented by Jiajing Fan. No later than July 27, 2020, Troy Law shall file a letter of no more than 3 pages responding to Jiajing Fan's letter, and explaining for the Court why Troy Law should not be disqualified as counsel. The parties are directed to appear for a telephone conference on July 29, 2020, at 12:00 p.m. The dial-in for the conference will be: Telephone # 888-363-4749; code: 2682448.

SO ORDERED:


HON. VERNON S. BRODERICK 7/24/2020
UNITED STATES DISTRICT JUDGE

Wang et al v. Shun Lee Palace Restaurant, Inc. et al
Case No. 1:17-cv-00840-VSB
Letter Motion

Dear Judge Broderick:

This firm is counsel for the Plaintiffs Cheng Xia Wang, Bao Guo Zhang, Chunlin Zhang, Ze Jun Zhang, Jun Qing Zhao, Ya Qiang Zhang, Jun Ling Zhao, Hui Min Zhao, Jing Sheng Guan, Li Weng in the above-referenced case. On July 10, 2019, we filed the Motion to Substitute the Attorneys for Cheng Xia Wang, Bao Guo Zhang, Chunlin Zhang, Ze Jun Zhang, Jun Qing Zhao (Doc. 109).

We are writing to respectfully request Court's intervene about Troy Law's improper solicitation and communication to the Plaintiffs this firm represents.

Today we learned surprisingly that Troy Law has been calling and harassing Plaintiff Chunlin Zhang, in order to solicitate him to change counsel and communicate about settlement positions. Specifically, Troy Law has invited Chunlin Zhang and other Plaintiffs we represent to Troy Law's office for a meeting on Saturday, July 25, 2020.

According to Model Rules of Professional Conduct Rule 7.3, attorneys cannot "solicit professional employment by live person-to-person contact with first when a significant motive for the lawyer's doing so is the lawyer's or law firm's pecuniary gain." Troy Law's conducts are so unethical and disruptive to this case, and should be tolerant.

Therefore, we were left no choice but respectfully request the Court to have an injunction to forbid Troy Law's unauthorized communication with Plaintiffs Cheng Xia Wang, Bao Guo

Zhang, Chunlin Zhang, Ze Jun Zhang, Jun Qing Zhao, Ya Qiang Zhang, Jun Ling Zhao, Hui Min Zhao, Jing Sheng Guan, Li Weng and sanction Troy Law for such ethical conducts.

We appreciate the Court for its attention and consideration to this matter.

Respectfully submitted,

/s/ Jiajing Fan
Jiajing Fan, Esq.
Attorney for Plaintiffs